

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION**

MDL NO. 3:16-md-2738-FLW-LHG

**JUDGE FREDA L. WOLFSON
MAG. JUDGE LOIS H. GOODMAN**

THIS DOCUMENT RELATES TO:

Civil Action No. 3:19-cv-13428-FLW-LHG

***DENISE BYNAM v. JOHNSON &
JOHNSON, et al.***

**ATTORNEY DECLARATION IN RESPONSE TO JOHNSON & JOHNSON
DEFENDANTS' MOTION TO DISMISS PLAINTIFF DENISE BYNAM'S COMPLAINT**

I. Melanie Meneses Palmer, declare:

1. I am an attorney at Kiesel Law LLP, co-counsel of record for Plaintiff Denise Bynam.
2. If called to testify, I could and would testify as to the matters set forth herein based on personal knowledge.
3. This declaration is filed in response to the Johnson & Johnson Defendants' Motion to Dismiss this action filed on September 9, 2020.
4. Despite extensive efforts to locate Ms. Bynam, plaintiff's counsel have been unable to make contact with her since the case was selected as part of the 1000 discovery cases. Plaintiff's counsel assigned an investigator to locate her, ran Lexis person searches, and attempted to contact a number of family members, but to no avail.
5. The undersigned respectfully asks the Court to grant a 30-day extension from the date of this filing, until October 21, 2020, to submit Ms. Bynam's Plaintiff Profile Form so that the undersigned may make a final attempt to locate Ms. Bynam and bring her into compliance with this Court's Orders on bellwether discovery.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 21, 2020, at Beverly Hills, California.

Respectfully Submitted,

KIESEL LAW LLP

By: /s/ Melanie Meneses Palmer
Melanie Meneses Palmer

Counsel For Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2020, a copy of the foregoing ATTORNEY DECLARATION IN RESPONSE TO JOHNSON & JOHNSON DEFENDANTS' MOTION TO DISMISS PLAINTIFF DENISE BYNAM'S COMPLAINT was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Melanie Meneses Palmer
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